

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(1) KHYEME JOHNSON and  
(2) TYRONE BELL

Defendants.

**08 CR 10.1.13 WGY**

) Criminal No.:

) VIOLATIONS:

)  
) 21 U.S.C. § 841 (a)(1) -  
) Distribution of Cocaine  
) Base Within 1000 Feet  
) of a School

)  
) 18 U.S.C. § 2 - Aiding  
) and Abetting

INDICTMENT

COUNT ONE: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine  
Base Within 1000 Feet of a School; 18 U.S.C. § 2  
-- Aiding and Abetting)

The Grand Jury charges that:

On or about March 17, 2008 in Suffolk County and in the  
District of Massachusetts,

(1) KHYEME JOHNSON AND (2) TYRONE BELL,

the defendants herein, did knowingly and intentionally distribute  
a quantity of cocaine, a Schedule II controlled substance.

The Grand Jury further alleges that the offense described  
herein was committed by the defendants within one thousand feet  
of the real property comprising a school, more particularly, the  
University High School in Boston, Massachusetts, in violation of

Title 21, United States Code, Section 860.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**FORFEITURE ALLEGATION**

**(21 U.S.C. § 853)**

The Grand Jury further charges that:

1. Upon conviction of the offenses alleged in Count 1 of this Indictment,

**(1) KHYEME JOHNSON AND (2) TYRONE BELL,**

defendants herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violation.

2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendant--

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value;

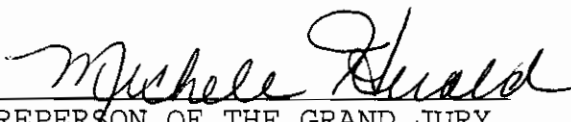
or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL,

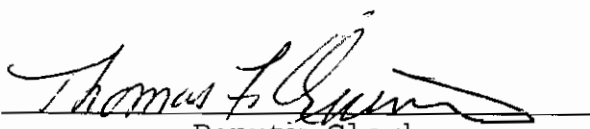
  
FOREPERSON OF THE GRAND JURY

  
GRETCHEN LUNDGREN  
SPECIAL ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS

May 7, 2008

Returned into the District Court by the Grand Jurors and  
filed.

  
Deputy Clerk  
5/7/08 @ 2:35pm